

FILED
CLERK U.S. DISTRICT COURT
DEC 15 2014
FEDERAL DISTRICT OF CALIFORNIA
DEPUTY

Samuel O. Ogbogu, Esq. (#156427)
 SAMUEL OGBOGU, INC.
 4311 Wilshire Boulevard, Suite 308
 Los Angeles, CA 90010
 Telephone: (213) 624-1500
 Facsimile: (213) 802-2946
sogboguinclaw@aol.com

Robert L. Shtofman, Esq. (#135577)
 Law Ofc Robert L. Shtofman
 18150 Chardon Cir
 Encino, CA 91316
 Tel. (818) 609-0090
 Fax (818) 609-1977
RShtofman@gmail.com

Gary S. Casselman, Esq. (#81658)
 CASSELMAN LAW OFFICES
 3415 S. Sepulveda Blvd., Suite 100
 Los Angeles, CA 90034
 Tel. (310) 314-4444 Fax: (310) 314-4447
garyscasselmann@gmail.com

Attorney for Plaintiffs, N.G. and L.G., Minors, by and through
 Their Guardian ad Litem, Lilliana Magallon; Sara Perez.

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

N.G. AND L.G., minors, by and
 through their Guardian ad Litem,
 Lilliana Magallon; SARA PEREZ.

Plaintiffs,

Vs.

COUNTY OF LOS ANGELES;
 LEROY BACA, DEPUTY DAVID
 CHEVEZ, DEPUTY LAWRENCE
 SWANSON AND DOES 3 – 10.

Defendants

Case No.: CV13-008312-SVW (FFMx)

**PLAINTIFFS' AMENDED
 WITNESS LIST – PHASE ONE
 TRIAL**

Trial date: August 12, 2014

Pre-trial Date: July 28, 2014

Time: 1:30 p.m.

Courtroom: 6

The Plaintiffs, N.G. L.G. and Sara Perez hereby submit the following Amended
 Witness List for Phase One. Plaintiffs reserve the right to amend and/or supplement
 this list:

PLAINTIFFS' AMENDED WITNESS LIST – PHASE ONE

1	No. Witness		
2	1. Jacob Marhefky, LVN <i>12/3</i>		
3	Direct Examiner:	Plaintiffs	Direct Exam Time Est.: .5
4	Cross Examiner:	COLA	Cross Exam Time Est.:
5	Brief Description of Testimony:	Witness to incident	
6			
7	2. Felix Travis		
8	Direct Examiner:	Plaintiffs	Direct Exam Time Est.: .5
9	Cross Examiner:	COLA	Cross Exam time Est.:
10	Brief Description of Testimony:	Witness to incident	
11			
12	3. Deputy Perez, David Chevez ✓ <i>12/2</i>		
13	Direct Examiner:	Plaintiffs	Direct Exam Time Est.: 1.0
14	Cross Examiner:	COLA	Cross Exam Time Est.:
15	Brief Description of Testimony:	Defendant and incident participant	
16			
17	4. Deputy Lawrence Swanson <i>12/2, 12/3</i>		
18	Direct Examiner:	Plaintiffs	Direct Exam Time Est.: 1.0
19	Cross Examiner:	COLA	Cross Exam Time Est.:
20	Brief Description of Testimony:	Defendant and incident participant	
21			
22	5. Evelyn Davis <i>12/3</i>		
23	Direct Examiner:	Plaintiffs	Direct Exam Time Est.: .5
24	Cross Examiner:	COLA	Cross Exam Time Est.:
25	Brief Description of Testimony:	Defendant and incident participant	
26			
27			
28			

1 6. **Kimberly King, LVN** 12/3

2 Direct Examiner: Leocadio Figueroa Direct Exam Time Est.: .5

3 Cross Examiner: COLA Cross Exam Time Est.:

4 Brief Description of Testimony: Witness to incident

5
6 7. **Bettye Chism** 12/3

7 Direct Examiner: Plaintiff Direct Exam Time Est.: .3

8 Cross Examiner: COLA Cross Exam Time Est.:

9 Brief Description of Testimony: Witness to incident

10

11 8. **Erendira Sanchez**

12 Direct Examiner: Plaintiff Direct Exam Time Est.: .5

13 Cross Examiner: COLA Cross Exam Time Est.:

14 Brief Description of Testimony: Witness to incident

15

16 9. **Deputy Joshua Short**

17 Direct Examiner: Plaintiff Direct Exam Time Est.: .5

18 Cross Examiner: COLA Cross Exam Time Est.:

19 Brief Description of Testimony: Investigating Deputy

20

21 10. **Deputy Kelly Eklund** 12/2

22 Direct Examiner: Plaintiff Direct Exam Time Est.: .3

23 Cross Examiner: COLA Cross Exam Time Est.:

24 Brief Description of Testimony: Arresting Deputy

25

26 11. **Deputy Samuel Gomez**

27 Direct Examiner: Plaintiff Direct Exam Time Est.: .3

28

1 Cross Examiner: COLA Cross Exam Time Est.:

2 Brief Description of Testimony: Arresting Deputy

3

4 **12. Deputy Frank Salerno**

5 Direct Examiner: Plaintiffs Direct Exam Time Est.: .5

6 Cross Examiner: COLA Cross Exam Time Est.: .3

7 Brief Description of Testimony: Investigating deputy

8

9 **13. Deputy Ron Duval**

10 Direct Examiner: Plaintiff Direct Exam Time Est.: .5

11 Cross Examiner: COLA Cross Exam time Est.:

12 Brief Description of Testimony: Investigating Deputy

13

14 **14. Macario Gutierrez**

15 Direct Examiner: Plaintiffs Direct Exam Time Est.: .5

16 Cross Examiner: COLA Cross Exam Time Est.: .2

17 Brief Description of Testimony: Prior contact with defendant

18

19 **15. Sara Perez**

20 Direct Examiner: Plaintiffs Direct Exam Time Est.: 1.0

21 Cross Examiner: COLA Cross Exam Time Est.: 1.0

22 Brief Description of Testimony: Party Plaintiff

23

24 **16. Liliana Magallon**

25 Direct Examiner: Plaintiffs Direct Exam Time Est.: 1

26 Cross Examiner: COLA Cross Exam Time Est.:

27 Brief Description of Testimony: Nature of Plaintiffs relationship and damages

28

1 17. **Dr. Arnold Sin** 12/4
 2 Direct Examiner: Plaintiff Direct Exam Time Est.: .5
 3 Cross Examiner: COLA Cross Exam Time Est.:
 4 Brief Description of Testimony: Witness to incident and examining physician
 5

6 18. **Dr. Cho Lwin** 12/2
 7 Direct Examiner Plaintiff Direct Exam Time Est: 1.0
 8 Cross Examiner COLA Cross Exam Time Est:
 9 Brief Description of Testimony: Gutierrez' autopsy findings and opinions
 10

11 19. **N.G.**
 12 Direct Examiner Plaintiff Direct Exam Time Est: .5
 13 Cross Examiner COLA Cross Exam Time Est:
 14 Brief Description of Testimony: Plaintiff.
 15

16 20. **L. G.**
 17 Direct Examiner Plaintiff Direct Exam .5
 18 Cross Examiner COLA Cross Exam
 19 Brief Description of Testimony: Plaintiff
 20

21 21. **Tom Streed, PhD** 12/3
 22 Direct Examiner Plaintiff Direct Exam 1.0
 23 Cross Examiner COLA Cross Exam
 24 Brief Description of Testimony: Expert opinion per Rule 26
 25

26 22. **Jesse Wobrock, PhD** 12/4
 27 Direct Examiner Plaintiff Direct Exam Time Est. 1.0
 28 Cross Examiner COLA Cross Exam Time Est.
 Brief description of Testimony: Expert Opinion Per Rule 26

1 23 **Ron Scott** *12/3*

2 Direct Examiner Plaintiff Direct Exam Time Est. 1.0

3 Cross Examiner COLA Cross Exam Time

4 Brief description of Testimony: Expert Opinion Per Rule 26

5 24. **Robert Johnson, PhD**

6 Direct Examiner Plaintiff Direct Exam Time Est. 1.0

7 Cross Examiner COLA Cross Exam Time

8 Brief description of Testimony: Expert Opinion Per Rule 26

9 25. **H. Ronald Fisk, MD, PhD**

10 Direct Examiner Plaintiff Direct Exam Time Est. 1.0

11 Cross Examiner COLA Cross Exam Time

12 Brief description of Testimony: Expert Opinion Per Rule 26

13 26. **Leonard Romero**

14 Direct Examiner Plaintiff Direct Exam Time Est. .50

15 Cross Examiner COLA Cross Exam Time

16 Brief description of Testimony: Expert Opinion and scene inspection

17 27. **Margaret Kaleuati**

18 Direct Examiner COLA Direct Exam Time Est. .50

19 Cross Examiner Leocadio Figueroa Cross Exam Time

20 Brief description of Testimony: Criminalist

21 28. **Ms. Eggins**

22 Direct Examiner Plaintiff Direct Exam Time Est. .30

23 Cross Examiner COLA Cross Exam Time

24 Brief description of Testimony: Video recording

25 29. **Brenda Shafer**

26 Direct Examiner Plaintiff Direct Exam Time Est. .30

27 Cross Examiner COLA Cross Exam Time

28

1 Brief description of Testimony: Coroner investigator

2

3 30. **Brenda Gutierrez**

4 Direct Examiner Plaintiff Direct Exam Time Est. .30

5 Cross Examiner COLA Cross Exam Time

6 Brief description of Testimony: Familial relationship

7

8 31. **Custodian of Record, Stryker**

9 Direct Examiner Plaintiff Direct Exam Time Est. .30

10 Cross Examiner COLA Cross Exam Time

11 Brief description of Testimony: Gurney

12

13 32. **Custodian of Records, Inglewood Park Cemetery**

14 Direct Examiner Plaintiff Direct Exam Time Est. .30

15 Cross Examiner COLA Cross Exam Time

16 Brief description of Testimony: Burial and funeral expenses

17

18 33. **Custodian of Records, Douglass Dunaway Mortuary**

19 Direct Examiner Plaintiff Direct Exam Time Est. .30

20 Cross Examiner COLA Cross Exam Time

21 Brief description of Testimony: Burial and funeral expenses

22

23 34. **Custodian of records, County of Los Angeles Sheriff's Department**

24 Direct Examiner Plaintiff Direct Exam Time Est. .30

25 Cross Examiner COLA Cross Exam Time

26 Brief description of Testimony: Investigative records and photographs

27 ///

28 ///

1 35. **Custodian of records, County of Los Angeles Coroner**
 2 Direct Examiner Plaintiff Direct Exam Time Est. .30
 3 Cross Examiner COLA Cross Exam Time
 4 Brief description of Testimony: Autopsy records
 5

6 36. **Custodian of records, Centinela Hospital Medical Center**
 7 Direct Examiner Plaintiff Direct Exam Time Est. .30
 8 Cross Examiner COLA Cross Exam Time
 9 Brief description of Testimony: Gutierrez medical records and Video of scene
 10

11 37. **Custodian of records, Magnetic Component Engineering**
 12 Direct Examiner Plaintiff Direct Exam Time Est. .30
 13 Cross Examiner COLA Cross Exam Time
 14 Brief description of Testimony: Employment Records of Gutierrez
 15

16 38. **A/Captain Wes Sutton**
 17 Direct Examiner Plaintiff Direct Exam Time Est. .30
 18 Cross Examiner COLA Cross Exam Time
 19 Brief description of Testimony: Incident / Investigation
 20

21 DATED: July 11, 2014

22 /s/Samuel O. Ogbogu
 23 Samuel O. Ogbogu, Esq.
 24 Robert S. Shtofman, Esq.
 25 Gary S. Casselman, Esq.
 26 Attorney for Plaintiffs
 27 N.G., L.G. and Sara Perez
 28

1 **Tomas A. Guterres, Esq. (State Bar No. 152729)**
 2 **Catherine M. Mathers, Esq. (State Bar No. 221983)**
 3 **Erin R. Dunkerly, Esq. (State Bar No. 260220)**
 4 **COLLINS COLLINS MUIR + STEWART LLP**
 5 **1100 El Centro Street**
 6 **South Pasadena, CA 91030**
 7 **(626) 243-1100 – FAX (626) 243-1111**
 8 **Email: tguterres@ccmslaw.com**
 9 **Email: cmathers@ccmslaw.com**
 10 **Email: edunkerly@ccmslaw.com**
 11 **Attorneys for Defendants, COUNTY OF LOS ANGELES, DEPUTY DAVID**
 12 **CHEVEZ and DEPUTY LAWRENCE SWANSON, JR.**

13 **UNITED STATES DISTRICT COURT**

14 **CENTRAL DISTRICT OF CALIFORNIA**

15 N.G. AND L.G., minors, by and) CASE NO. CV13-008312-SVW(FFMx)
 16 through their Guardian ad Litem,) [Assigned to Judge Stephen V. Wilson,
 17 Lilliana Magallon; SARA PEREZ,) Courtroom 6]
 18)
 19 Plaintiffs,) **DEFENDANTS DEPUTY DAVID**
 20) **CHEVEZ AND DEPUTY LAWRENCE**
 21 vs.) **SWANSON, JR.'S AMENDED**
 22) **WITNESS LIST**
 23 COUNTY OF LOS ANGELES;)
 24 LEROY BACA, DEPUTIES DAVID)
 25 CHEVEZ and LAWRENCE) **Trial Date: August 12, 2014**
 26 SWANSON, JR.; AND DOES 3 – 10,)
 27)
 28 Defendants.)

29 **TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF**
 30 **RECORD:**

31 Defendants DEPUTY DAVID CHEVEZ and DEPUTY LAWRENCE
 32 SWANSON, JR. hereby submit the following amended witness list pursuant to Local
 33 Rule 16-5 of the United States District Court or the Central District of California and
 34 F.R.Civ.P. 26(a)(3)(A):

DEFENDANTS' WITNESSES

NO.	WITNESS	ADDRESS	TELEPHONE
1	Deputy Lawrence Swanson Jr.	May be contacted through defense counsel.	
2	Deputy David Chevez	May be contacted through defense counsel.	
3	Sgt. Frank Salerno	May be contacted through defense counsel.	
4	Sgt. Ron Duval*	May be contacted through defense counsel.	
5	Deputy J. Short #517841*	May be contacted through defense counsel.	
6	Deputy M. Maxwell #499028*	May be contacted through defense counsel.	
7	Deputy Jonathan Hill #519819*	May be contacted through defense counsel.	
8	Deputy Woullard #515209*	May be contacted through defense counsel.	
9	Sgt. Hoglund #27712*	May be contacted through defense counsel.	
10	Sgt. Mitch Loman #219078*	May be contacted through defense counsel.	
11	Scott Cooper #260209*	May be contacted through defense counsel.	
12	Deputy John Chun*	May be contacted through defense	

* Witnesses who may be called only if need arises, pursuant to *Local Rule* 16-5.

1		counsel.	
2	13	Sgt. Don Rasmussen*	May be contacted through defense counsel.
3			
4	14	Criminalist Manuel Muñoz #233804*	May be contacted through defense counsel.
5			
6	15	Alex G. Strouzer #285040*	May be contacted through defense counsel.
7			
8	16	Maryam Nickooshiam #547025*	May be contacted through defense counsel.
9			
10	17	M. Acevedo*	unknown unknown
11			
12	18	Daniel T. Anderson*	May be contacted through defense counsel.
13			
14	19	Deputy S. Gomez #514216*	May be contacted through defense counsel.
15			
16	20	Deputy J. Kelley-Eklund # 514228*	May be contacted through defense counsel.
17			
18	21	Deputy Maldonado #516337*	May be contacted through defense counsel.
19			
20	22	Deputy Sean Kusiak #505185*	May be contacted through defense counsel.
21			
22	23	Margaret A. Kalevati, Senior Criminalist*	May be contacted through defense counsel.
23			
24	24	Sean Yoshi, Criminalist*	May be contacted through defense counsel.
25			
26	25	Dep. Sean Hoodye*	May be contacted through defense counsel.
27			
28	26	Cho Lwin, M.D.*	May be contacted through defense

1			counsel.	
2	27	Dr. Arnold Sin	1068 Holiday Drive, West Covina	626-780-1199
3	28	Camille Concepcion, RN*	555 E Hardy St, Inglewood, CA 90301	909-569-9986
4	29	McCaul Flack*	555 E Hardy St, Inglewood, CA 90301	310-968-3264
5	30	Rosanna Camargo, RN*	555 E Hardy St, Inglewood, CA 90301	562-291-9366
6	31	Noelle Winner, RN*	555 E Hardy St, Inglewood, CA 90301	310-256-7142
7	32	Ollibunmi Salani, RN*	555 E Hardy St, Inglewood, CA 90301	562-743-8853
8	33	Tiffani Laffoon, RN*	555 E Hardy St, Inglewood, CA 90301	951-880-5190
9	34	Erenderia Sanchez-Soto, RN	2829 West Ligan, Santa Ana, CA 92704	(424) 240-1218
10	35	Jacob Marhefky, LVN	May be contacted through counsel for Ceninela Hospital	
11	36	Bettye Chism, LVN*	1842 East Avenue R5, Palmdale, 93550.	
12	37	David Lopez, EMT*	555 E Hardy St, Inglewood, CA 90301	Unknown
13	38	A. Prude*	555 E Hardy St, Inglewood, CA 90301	Unknown
14	39	Alfreda Kennedy*	555 E Hardy St, Inglewood, CA 90301	Unknown
15	40	Kimberly King, RN*	12584 Atwood Ct., # 1811, Rancho Cucamonga, CA 91739	(909) 227-0243 or (909) 597- 3663
16	41	Danilo Tecson*	Unknown	818-481-4179
17	42	Christopher Chang *	Unknown	562-881-2619
18	43	Lashanique Hulse*	1305 W. 90 th Street, Los Angeles 90044	(323)867-0066
19	44	Carmen Cotton*	11112 Normandie Ave. #3 Los Angeles, CA 90044	(323)649-0134
20	45	Ted Luckow*	Unknown	Unknown
21	46	Evelyn Davis	904 West 73rd Street, Apartment 2, Los	

1		Angeles, CA 90044	
2	47	Thomas Rodgers*	5401 West Blvd, Los Angeles 90043 Unknown
3	48	Lilliana Magallon	May be contacted through plaintiffs' counsel
4			
5	49	Felix Dwight Travis*	901 West 73rd Street, Los Angeles, CA 90044 323-392-6338
6	50	Philip S. Trompetter, PhD, ABPP	May be contacted through defense counsel.
7			
8	51	Vina R. Spiehler, PhD, DABFT	May be contacted through defense counsel.
9			12/4
10	52	Commander (ret.) Gil Jurado	May be contacted through defense counsel.
11			
12	53	Sgt (ret.) Paul Delhauer	May be contacted through defense counsel.
13			12/4
14	54	Michelle Hoffman, M.S.	May be contacted through defense counsel.
15			12/4
16	55	Custodian of Records for Los Angeles County Coroner Department*	May be contacted through defense counsel.
17			
18	56	Custodian of Records for Los Angeles County Sheriff's Department*	May be contacted through defense counsel.
19			
20	57	Custodian of Records for Los Angeles County Sheriff's Department Scientific Services Bureau*	May be contacted through defense counsel.
21			
22	58	Custodian of Records for Centinela Hospital*	May be contacted through counsel for Centinela Hospital
23			
24	59	Custodian of Records for Bank of America*	Bank of America Corporation, 818 W. Seventh St., Los Angeles, CA 90017 UNKNOWN
25			
26			
27			
28			

60	Custodian of Records for Magnetic Component Engineering*	2830 Lomita Blvd., Torrance, CA 90505	UNKNOWN
61	Custodian of Records for Douglass and Dunaway Mortuary*	4286 W. Broadway, Hawthorne, CA 90250	UNKNOWN
62	Custodian of Records for Inglewood Park Cemetery*	720 E. Florence Ave., Inglewood, CA 90301	UNKNOWN
	Custodian of Records for Stryker*	2825 Airview Boulevard, Kalamazoo, MI 49002	269 389 7469

Defendants reserve the right to call any and all witnesses identified by any other party in this action, and all witnesses that have been previously deposed.

Defendants also reserve the right to amend or supplement this list if any of the above-named witnesses become unavailable.

Defendants further reserve the right to name and call back additional witnesses upon reasonable notice to counsel and to call rebuttal witnesses whose testimony cannot be reasonably anticipated at the time of this disclosure.

Defendants also reserve the right not to call any of the above witnesses.

DATED: July 8, 2014

COLLINS COLLINS MUIR + STEWART LLP

By: 

ERIN R. DUNKERLY

TOMAS A. GUTERRES

CATHERINE M. MATHERS

Attorneys for Defendants, COUNTY OF
LOS ANGELES, DEPUTY DAVID

CHEVEZ and DEPUTY LAWRENCE
SWANSON, JR.

Tomas A. Guterres, Esq. (State Bar No. 152729)
 Catherine M. Mathers, Esq. (State Bar No. 221983)
 Erin R. Dunkerly, Esq. (State Bar No. 260220)
COLLINS COLLINS MUIR + STEWART LLP
 1100 El Centro Street
 South Pasadena, CA 91030
 (626) 243-1100 – FAX (626) 243-1111

Email: tguterres@ccmslaw.com

Email: cmathers@ccmslaw.com

Email: edunkerly@ccmslaw.com

Attorneys for Defendants, COUNTY OF LOS ANGELES and DEPUTY DAVID
 CHEVEZ and DEPUTY LAWRENCE SWANSON, JR.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

N.G. AND L.G., minors, by and
 through their Guardian ad Litem,
 Lilliana Magallon; SARA PEREZ,

Plaintiffs,

vs.

COUNTY OF LOS ANGELES;
 LEROY BACA, DEPUTIES DAVID
 CHEVEZ and LAWRENCE
 SWANSON, JR.; AND DOES 3 – 10,

Defendants.

) CASE NO. CV13-008312-SVW(FFMx)
) [Assigned to Judge Stephen V. Wilson,
) Courtroom 6]

)
) **DEFENDANTS DEPUTY DAVID**
) **CHEVEZ and DEPUTY LAWRENCE**
) **SWANSON, JR.'S AMENDED EXHIBIT**
) **LIST**

) **Trial Date: August 12, 2014**

TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants DEPUTY DAVID CHEVEZ and DEPUTY LAWRENCE
 SWANSON, JR. hereby submit the following submit the following amended list of
 exhibits that are intended for use at trial pursuant to F.R.Civ.P. 26(a)(3)(A)(iii).

Defendants are not currently in possession of a proposed exhibit list from plaintiffs;

1 therefore, Defendants reserve their right to amend or supplement this list prior to trial.
2 Defendants reserve their right to introduce exhibits not listed for rebuttal purposes:

3 **DEFENDANTS' EXHIBIT LIST**

4

Exhibit No.	Description	Date Identified	Date Admitted
200.	Homicide File No. 012-09150-0399-013 Cover Sheet and Table of Contents COLA0001 - COLA0003		
201.	Incident Report (Lennox Sheriff's Station, Deputies J. Short and M. Maxwell) COLA0004 - COLA0009		
202.	Major Incident Log COLA0010 - COLA0014		
203.	Supplemental Report (Lennox Sheriff's Station, Deputy J. Hill) - Active/Additional COLA0015- COLA0020		
204.	Supplemental Report (Lennox Sheriff's Station, Deputy Loera) - Active/Additional COLA0021 - COLA0023		
205.	Supplemental Report (Lennox Sheriff's Station, Deputy Maldonado) - Active/Additional Information COLA0024		
206.	Supplemental Report (Lennox Sheriff's Station, Deputy M. Maxwell) - Active/Additional Information COLA0025		
207.	Supplemental Report (Lennox Sheriff's Station, Deputy J. Short) - Active/Additional Information COLA0026 - COLA0027		
208.	Supplemental Report (Lennox Sheriff's Station, Deputy D. Woullard) - Active/Additional Information COLA0028		

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DEFENDANTS' AMENDED EXHIBIT LIST

1	209.	Supplemental Report (Lennox Sheriff's Station, Deputy S. Kusiak) - Active/Additional COLA0029 - COLA0030		
2	210.	Hospital Release Form Re: Gutierrez, Jilberto COLA0031		
3	211.	Supplementary Report (Homicide Bureau, Sergeants S. Hoglund and M. Loman) - Active/Investigation Conducted/Evidence collected/Additional Information/CC #2012-06827 COLA0032 - COLA0037		
4	212.	Supplementary Report (Homicide Bureau, Detectives F. Salerno and R. Duval) - Active/Investigation Conducted/Witnesses and Victims Interviewed/Evidence Collected/Coroner's Case #2012-06827. COLA0038 - COLA0056		
5	213.	Supplementary Report (Scientific Services Bureau, Deputy J. Chun) - Active/Additional Information/Photographs Taken/Seized Evidence COLA0057 - COLA0058		
6	214.	Supplementary Report (Scientific Services Bureau, Deputy J. Chun) - Active/Additional Information /Photographs Taken/Sketch COLA0059		
7	215.	Firearms Identification Report Re: Lab Receipts #K382943 and K454815 COLA0060		
8	216.	Chemical Processing Examination Report Re: Lab Receipt #K382940 COLA0061		
9	217.	Biological Evidence Examination Report Re: Lab Receipts #K382940		

1		and K461576		
2		COLA0062 - COLA0064		
3	218.	Crime Scene Sketches COLA0065 - COLA0066		
4	219.	Autopsy Report (County of Los Angeles Department of Coroner) Re: Gutierrez, Jilberto	✓ AAA	AAA
5	PA	COLA0067 - COLA0091		
6				
7	220.	Los Angeles County Sheriff's Department Records Re: 912-09128-0383-184	12/2	
8		COLA0092 - COLA0099		
9				
10	221.	Los Angeles County Booking and Property Records	12/2	
11		COLA0131 - COLA0146		
12	222.	Supplementary Report (Detective Division-Homicide Bureau) - Inactive/District Attorney's Letter of Opinion / Case Closed		
13		COLA0147 - COLA0153		
14				
15	223.	Scene Photos	12/3	12/3
16		COLA0154 - COLA0372		
17	224.	Autopsy Photos		
18		COLA0373 - COLA0452		
19	225.	CA Scott Cooper Interview (Audio File)		
20		COLA0453		
21	226.	Dep David Chevez Interview (Audio File)		
22		COLA0454		
23	227.	Dep Larry Swanson Interview (Audio File)		
24		COLA0455		
25	228.	Dr. Arnold Sin Interview (Audio File)		
26		COLA0456		
27	229.	Evelyn Davis Interview (Audio File)		
28		COLA0457		
	230.	Felix Travis Interview (Audio File)		
		COLA0458		
	231.	Kimberley King Interview (Audio File)		

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DEFENDANTS' AMENDED EXHIBIT LIST

17

1		COLA0459		
2	232.	Semisi Latu Interview (Audio File) COLA0460		
3				
4	233.	1018 angle 2 0006 Security DVR (Video File) COLA0461		
5				
6	234.	1018 angle 4 0006 Security DVR (Video File) COLA0462		
7	235.	1018 angle 4 DVR ED2 (Video File) COLA0463	12/3	12/3
8				
9	236.	1018 angle 8 0017 DVR ED (Video File) COLA0464		
10				
11	237.	1018 angle 12 0006 DVR SS Closet (Video File) COLA0465		
12				
13	238.	1018 angle 15 0006 DVR SS Closet (Video File) COLA0456		
14				
15	239.	101812 0105 hrs Radio Traffic (Audio File) COLA0467		
16				
17	240.	101812 0109 hrs Radio Traffic (Audio File) COLA0468		
18				
19	241.	101812 0110 hrs Radio Traffic (Audio File) COLA0469		
20				
21	242.	Deputy Daily Worksheet COLA0470 - COLA0471		
22				
23	243.	LA County Fire Department Emergency Medical Services Report Form COLA0472 - COLA0475		
24				
25				
26	244.	Subpoenaed Records from the County of Los Angeles - Department of Medical Examiner-Coroner COLA0476 - COLA0483		
27				
28				

1		Subpoenaed Records from the County		
2	245.	of Los Angeles – Department of		
3		Medical Examiner-Coroner (Forensic		
4		Science Laboratories)		
5		COLA0484 - COLA593		
6	246.	Subpoenaed Records from Centinela		
7	PG 15	Hospital	✓	✓
8		COLA0594 - COLA0620		
9	247.	Subpoenaed Records from Bank of		
10		America Re: Jilberto Gutierrez		
11		COLA0621 - COLA0818		
12	248.	Subpoenaed Records from Magnetic		
13		Component Engineering		
14		COLA0819 - COLA0896		
15	249.	Subpoenaed Records from Douglass		
16		and Dunaway Mortuary		
17		COLA0897 - COLA0913		
18	250.	Subpoenaed Records from Inglewood		
19		Park Cemetery		
20		COLA0914 - COLA0944		
21	251.	Subpoenaed Records from Stryker		
22		COLA0945 - COLA01110		
23	252.	LASD Training Records for Dep.		
24		Swanson		
25		COLA01111 - COLA01116		
26	253.	LASD Training Records for Dep.		
27		Chevez		
28		COLA01117 - COLA01122		
	254.	Plaintiffs' Initial Rule 26 Disclosures		
	255.	Plaintiffs' Supplemental Rule 26		
	pg 7	Disclosures	→	abt
	256.	Plaintiff N.G.'s Responses to Dep.		
	pg 8	Chevez's Special Interrogatories (Set	→	
		One)		

1	257.	Plaintiff N.G.'s Responses to Dep. Chevez's Request for Production (Set One)		
2				
3	258.	Plaintiff L.G.'s Responses to Dep. Chevez's Special Interrogatories (Set One)		
4				
5	259. pg 2 except 35	Plaintiff L.G.'s Responses to Dep. Chevez's Request for Production (Set One)		7
6				
7	260.	Plaintiff Sara Perez's Responses to Dep. Chevez's Special Interrogatories (Set One)		7
8				
9	261.	Plaintiff Sara Perez's Responses to Dep. Chevez's Request for Production (Set One)		
10				
11	262.	Plaintiff N.G.'s Responses to Dep. Swanson's Special Interrogatories (Set One)		7
12				
13	263.	Plaintiff N.G.'s Responses to Dep. Swanson's Request for Production (Set One)		
14				
15	264.	Plaintiff L.G.'s Responses to Dep. Swanson's Special Interrogatories (Set One)		
16				
17	265.	Plaintiff L.G.'s Responses to Dep. Swanson's Request for Production (Set One)		
18				
19	266.	Plaintiff Sara Perez's Responses to Dep. Swanson's Special Interrogatories (Set One)		
20				
21	267.	Plaintiff Sara Perez's Responses to Dep. Swanson's Request for Production (Set One)		
22				
23	268.	Expert Report of Philip S. Trompetter, PhD, ABPP		
24				
25	269.	Expert Report of Vina R. Spiehler, PhD, DABFT		
26				
27	270.	Expert Report of Commander (ret.) Gil Jurado		
28				

271.	Expert Report of Sgt (ret.) Paul Delhauer		
272.	Expert Report of Michelle Hoffman, M.S.		
273.	Demonstrative Exhibits		

DATED: July 8, 2014

COLLINS COLLINS MUIR + STEWART LLP

By: 

ERIN R. DUNKERLY

TOMAS A. GUTERRES

CATHERINE M. MATHERS

Attorneys for Defendants, COUNTY OF

LOS ANGELES, DEPUTY DAVID

CHEVEZ, DEPUTY LAWRENCE

SWANSON, JR., DEPUTY SAMUEL

GOMEZ and DEPUTY JOSHUA

KELLEY-EKLUND

1 Samuel O. Ogbogu, Esq. (#156427)
2 SAMUEL OGBOGU, INC.
3 4311 Wilshire Boulevard, Suite 308
4 Los Angeles, CA 90010
5 Telephone: (213) 624-1500
6 Facsimile: (213) 802-2946
7 sogboguinclaw@aol.com

8 Robert L. Shtofman, Esq. (#135577)
9 Law Ofc Robert L. Shtofman
10 18150 Chardon Cir
11 Encino, CA 91316
12 Tel. (818) 609-0090
13 Fax (818) 609-1977
14 RShtofman@gmail.com

Gary S. Casselman, Esq. (#81658)
CASSELMAN LAW OFFICES
3415 S. Sepulveda Blvd., Suite 100
Los Angeles, CA 90034
Tel. (310) 314-4444 Fax: (310) 314-4447
garyscasselman@gmail.com

15 Attorney for Plaintiffs, N.G. and L.G., Minors, by and through
16 Their Guardian ad Litem, Lilliana Magallon; Sara Perez.

17
18
19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**

21 N.G. AND L.G., minors, by and through their
22 Guardian ad Litem, Lilliana Magallon; SARA
23 PEREZ.

24 Plaintiffs,
25 Vs.

26 COUNTY OF LOS ANGELES; LEROY
27 BACA, DEPUTY DAVID CHEVEZ,
28 DEPUTY LAWRENCE SWANSON AND
DOES 3 – 10.

Defendants

Case No.: CV13-008312-SVW (FFMx)

**PLAINTIFFS' AMENDED
EXHIBIT LIST – PHASE ONE
TRIAL**

Trial Date: December 2, 2014

Time: 9:00 a.m.

Courtroom: 6

29 Plaintiffs, N.G. L.G. and Sara Perez hereby submit the following List of
30 Exhibits for use at Trial, Phase One. Plaintiffs reserve the right to amend and/or
31 supplement this list:

TO THE CLERK OF THE UNITED STATES DISTRICT COURT:

Exhibit No.	Description	Date Identified	Date Admitted
1.	Family Photographs depicting Jilberto Gutierrez and family members		
2.	LA County Fire Department Emergency Medical Services Report Form		
3.	Centinela Hospital Medical Center - Records of Jilberto Gutierrez	12/3	12/3
4.	Sketch of Room 12 by M. Acevedo COLA 0065	12/3	12/3
5.	Sketch of 12 by Dept. J. Chun COLA 0066		
6.	Photographs depicting Deputy David Chevez COLA 0154 – 0158		
7.A, B	Photographs depicting Deputy Lawrence Swanson COLA 0159 – 0163	12/3	12/3
8.	Photographs depicting exterior of Centinela Hospital Emergency Facility COLA 0164 – 0172		
9.	Photographs depicting the Nursing Station II – near Room 12 COLA 0190	12/3	12/3
10.	Photographs depicting Hallway of Room 12 COLA 0191 – 0194		
11.	Photographs depicting Entrance to room 12 COLA 0195 – 0196		

13-C ✓
 13-D ✓
 13-E ✓
 13-F ✓
 13-G ✓
 13-H ✓
 I
 J
 K
 L

1	12. 12B	Photographs depicting view of Room 12 from the entrance door	12-3	12-3
2		COLA 0197		
3		COLA 0431		
4	13. 13A	Photographs depicting the Scene inside Room 12	12/2 12/2	12/2
5	13-A ✓			
6	13-B ✓	COLA 0198 - 0354*		
7	14. D	Photographs Depicting hand gun with bullets	12/2 12/2	
8		COLA 0355 - 0356; 0371 - 0372		
9	15. D	Photographs of Room 12 inspection - 2014	12/2	12/2
10	16. 16B	Autopsy Photographs	12/2	12/2
11		COLA 0404		
12		COLA 0414 - 0416		
13		COLA 0429		
14	17.	Additional Autopsy Photos		
15		COLA 0432		
16		COLA 0434		
17		COLA 0437		
18		COLA 0445		
19	18.	Scott Cooper Interview Audio Interview		
20		COLA 0453		
21	19.	Deputy Lawrence Swanson Audio Interview		
22		COLA 0455		
23	20.	Security Video - 1018 angle 12 0006 SS Closet		
24		COLA0465		
25	21.	Security Video - 1018 angle 4 DVR ED2		
26		COLA0463		

1	22.	Chemical Processing Examination Report of Beretta Model 92FS 9mm semi-automatic handgun by Alex Strouzer #285040	12/2	12/2
2		COLA 0061		
3	23.	Projectile Evidence		
4		COLA 0064		
5	24.	Records from County of Los Angeles – Department of Medical Examiner – Coroner	12/2	12/2
6	24A ✓			
7	25.	Sketches of Deputy David Chevez demonstrating position of the deputies at the scene (<i>Exhibits 1, 1A and 7 to deposition of Chevez, Vols. 1 and 2</i>)	12/2	12/2
8	25A			
9	26. A	Photographs of Deputy Chevez demonstrating Shooting Positions (<i>Exhibits 2 and 3 to depositions of Chevez Vol. and Dr. Lwin Deposition</i>)	12-3 12/2	12-3 12/2
10	26B ✓			
11	26C ✓			
12	27.	Photograph of Deputy David Chevez demonstrating punching fist (<i>Exhibit 13 to Chevez deposition Vol. 2 and 3</i>)		
13				
14	28.	Photograph depicting palms of Deputy Chevez (<i>Exhibit 5 of deposition of Chevez, Vol 2 and 3</i>)		
15				
16	29.	Photographs of Deputy Lawrence Swanson's gun holster.		
17				
18	30.	Photograph depicting the spot identified by Deputy David Chevez as the shooting spot (<i>Exhibit 18 to deposition of David Chevez</i>)	12/2	12/2
19				
20	31.	Circle reflecting the position of Deputy Lawrence Swanson at the time of the gunshot (<i>Exhibit 26 to Swanson Deposition</i>)		
21				
22	32.	Photograph of Deputy Lawrence Swanson demonstrating the position of Jilberto Gutierrez at the time of the Shooting (<i>Exhibit 21 to Swanson deposition</i>).	12/3	12/3
23	A+B			
24				
25				
26				
27				
28				

1	33.	Photograph of Deputy Swanson Demonstrating Swanson's position at the time of the shooting (Exhibit 33 to Swanson deposition).	12/3	12/3
2				
3	34.	Circle reflecting the position of Deputy Lawrence Swanson at the time of the gunshot (Exhibit 34 to Swanson Deposition)		
4				
5	35.	Photographs of Styrofoam Model with knitting needle attached deposition of Cho Lwin, MD (Exhibits 6,7)	12/2	12/2
6				
7	36.	Certificate of Live Birth for N.G.		
8				
9	37.	Certificate of Live Birth for L.G.		
10				
11	38.	Certificate of Live Birth for Jilberto Gutierrez		
12				
13	39.	Records from Douglas and Dunaway Mortuary		
14				
15	40.	Records from Inglewood Park Cemetery		
16				
17	41.	Demonstrative Exhibit No. 1 – Styrofoam Model		
18				
19	42. A.B.	Expert's Animated Depiction of Shooting	✓	✓
20				
21	43.	Minor children's Goodbye Letter		
22				
23	44.	Minor children's letters about Father		
24				
25	45.	Minor children's Memory Box		
26				
27	46.	Radio Traffic Audio - 101812 0105 hours COLA0467		
28				

DATED: 12/1/14

By /S/ Samuel Ogbogu

Samuel Ogbogu, Esq.
Robert S. Shtofman, Esq.
Gary S. Casselman, Esq.
Attorneys for Plaintiffs,
N.G., L.G., and Sara Perez